



Driving progress  
through partnership

David M. Halbreich

Direct Phone: +1 213 457 8033

Email: dhalbreich@reedsmith.com

Reed Smith LLP  
355 South Grand Avenue  
Suite 2900  
Los Angeles, CA 90071-1514  
+1 213 457 8000  
Fax +1 213 457 8080  
reedsmith.com

November 11, 2022

**Via Electronic Filing (ECF)**

**MEMORANDUM ENDORSED**

The Honorable Gabriel W. Gorenstein  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *LRN Corp. v. Markel Ins. Co.*, No. 1:-20-cv-8431-AJN-GWG**

Dear Judge Gorenstein:

This letter is submitted jointly on behalf of Plaintiff, LRN Corp. (“LRN”) and Defendant, Markel Insurance Co. (“Markel”), (collectively “the Parties”) in the above-captioned insurance coverage action (the “Action”).

As Your Honor is aware, on August 18, 2022, at the Parties’ request, the Court adjourned all deadlines in the matter and ordered the Parties to report on the status of settlement by September 2. (Dkt. 95). Thereafter, the Court granted further extensions of the stay. (Dkt. 96, Dkt. 98). The Parties requested the stay because they had reached an agreement in principle to settle, contingent upon the settlement of the underlying action styled *Robert A Davidow v. LRN Corp., et al.*, pending in the Delaware Chancery Court, Case No. 2019-0150-MTZ (the “*Davidow* Litigation”).

This letter is to update Your Honor that the parties to the *Davidow* Litigation have now reached a settlement in principle. As such, the Parties request that the Action continue to be stayed until they can document the settlement and file a stipulation of dismissal.

Respectfully Submitted,

/s/ David M. Halbreich

David M. Halbreich

DMH:sd

cc: All Counsel of Record (via ECF)

In light of the potential for settlement, all deadlines in this matter are adjourned sine die. The parties shall report to the Court by January 11, 2023, by letter as to the status of settlement.

So Ordered.

  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge

November 10, 2022